

UNITED STATES BANKRUPTCY COURT
Western District of Missouri

In re:)
)
Mary Crooks,)
Debtor,)
) Case No. 05-71032
)
) Chapter 13
)
Missouri Department of Revenue,) DEBTOR'S ANSWER TO THE
Movant,) MISSOURI DEPARTMENT OF
) REVENUE'S MOTION TO DISMISS
)
)
vs.)
)
Mary Crooks,)
)
and) Castle Law Offices
) 818 Grand Blvd.
Missouri Department of Revenue,) Ste. 700
Respondent.) Kansas City, MO 64106

**DEBTOR'S RESPONSE TO THE MISSOURI DEPARTMENT OF REVENUE'S MOTION
TO DISMISS**

Comes Now Debtor, Mary Crooks, by and through her attorney of record, Jason C. Amerine, and answers the Missouri Department of Revenue's Motion to Dismiss as follows:

1. That on or about December 16, 2005, the Missouri Department of Revenue filed a Motion to Dismiss for Debtor's failure to file tax returns for the 2002 and 2004 tax years.
2. That on or about January 4, 2006, Debtor stated that she is in the process of getting her taxes prepared, and that she will forward the taxes to our office when they are completed.

3. That Debtor's counsel will forward the taxes to Missouri Department of Revenue upon receipt.

WHEREFORE, Debtor respectfully requests this Court enter an order denying the Missouri Department of Revenue's Motion to Dismiss; and for such other and further relief as this Court deems necessary and proper.

RESPECTFULLY SUBMITTED,

Castle Law Office of Kansas City

By: /s/Jason C. Amerine
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Attorney for Debtor

Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing Answer the Missouri Department of Revenue's Motion to Dismiss was served via electronic filing, on the following parties this January 4, 2006.

/s/Jason C. Amerine
Jason C. Amerine #50857

Mr. Richard V. Fink
Chapter 13 Trustee
818 Grand Blvd. Ste. 800
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